

VINCENT A. PEPPER
ROBERT F. CORAZZINI
PETER GUTMANN
JOHN F. GARZIGLIA
NEAL J. FRIEDMAN
ELLEN S. MANDELL
HOWARD J. BARR
MICHAEL J. LEHMKUHL *
SUZANNE C. SPINK *
RONALD G. LONDON *
* NOT ADMITTED IN D.C.

PEPPER & CORAZZINI
L. L. P.

ATTORNEYS AT LAW
1776 K STREET, NORTHWEST, SUITE 200
WASHINGTON, D. C. 20006
(202) 296-0600

GREGG P. SKALL
E. THEODORE MALLYCK
OF COUNSEL
FREDERICK W. FORD
1909-1986

TELECOPIER (202) 296-5572
INTERNET PEPCOR@COMMLAW.COM
WEB SITE HTTP://WWW.COMMLAW.COM

September 4, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RECEIVED
SEP 4 1996
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

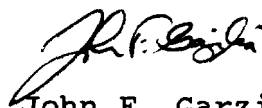
Re: Amendment of Section 73.202(b) FM Table of
Allotments (Mount Vernon, Kentucky)

Dear Mr. Caton:

Transmitted herewith on behalf of Rock Communications of Mount Vernon is an original and four copies of a petition seeking the institution of a rule making proceeding to allot FM Channel 270A to Mount Vernon, Kentucky. This petition is respectfully directed to the Chief, Allocations Branch.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,



John F. Garziglia

Enclosure

024
MMB

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

SEP 4 - 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b)) RM _____
Table of Allotments)
FM Broadcast Stations)
(Mount Vernon, Kentucky))

To: Chief, Allocations Branch

PETITION FOR RULE MAKING

Rock Communications of Mount Vernon, by its attorneys, pursuant to Section 1.401 of the Commission's rules, hereby seeks the institution of a rule making proceeding looking toward the allotment of FM Channel 270A to Mount Vernon, Kentucky (population 2,654 persons -- 1990 U.S. Census), as its third local transmission service.^{1/}

Attached is an engineering exhibit prepared by Louis A. Williams, Jr., P.E. showing full spacings for the proposed allotment. It is proposed that the FM Table of Allotments be amended as follows:


<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Mount Vernon, Kentucky	275A	270A, 275A

^{1/} FM Channel 270A may be allotted to Mount Vernon, Kentucky consistent with all Commission spacing rules at reference coordinates of 37° 22' 29" North Latitude, 84° 26' 41" West Longitude, a site approximately ten kilometers northwest of Mount Vernon.

Rock Communications of Mount Vernon has a present intention to apply for the channel, if allotted, and if authorized, to build a station promptly.

Respectfully submitted,

**ROCK COMMUNICATIONS OF
MOUNT VERNON**

By: 
John F. Garziglia
Its Attorney

Pepper & Corazzini, L.L.P.
1776 K Street, N.W.
Suite 200
Washington, D.C. 20006
(202) 296-0600

September 4, 1996

ENGINEERING EXHIBIT FOR
PROPOSED CHANNEL 270 CLASS A FM BROADCAST ALLOTMENT
FOR MOUNT VERNON, KENTUCKY

This engineering exhibit supports the allotment of Channel 270 as a Class A FM Broadcast channel to Mount Vernon, Kentucky. The attached computer printout shows that Channel 270 meets all the spacing requirements of 47 CFR 73.207 for the coordinates of 37° 22' 29" N, 84° 26' 41" W.

As noted on the right side of the computer printout, the required spacing is exceeded on all relevant co-, adjacent, and IF channels, except for the WLJC license. The distance to WLJC satisfies the spacing requirements when rounded to the nearest kilometer in accordance with 47 C.F.R. 73.208(c)(8).

The attached Figure 1 shows that the proposed coordinates provide city grade coverage to all of Mount Vernon, Kentucky. Figure 1 shows the F(50,50) 70 dBu contour for 6 kW effective radiated power (ERP) at 100 m height above average terrain (HAAT) at the proposed coordinates.


The distance to the 70 dBu contour was calculated using the FCC computer code CURVES. The map projection used was the Kentucky State Plane, North, converted to metric units. The terrain elevation was calculated using the NGDC 30-second data base in one degree azimuthal steps. The effective antenna height in the direction of the radial was calculated by taking the radiation center above mean sea level (RCAMSL) and subtracting the average terrain elevation for that radial. The legal boundaries for Mount Vernon, Kentucky were taken from the Bureau of the Census TIGER/Line Census Files, 1990 for Kentucky.

Louis A. Williams, Jr. certifies that he is a consulting engineer doing business since 1970 as Louis A. Williams, Jr. and Associates with offices at 2092 Arrowood Place, Cincinnati, Ohio 45231. He holds a degree of Bachelor of Science in Humanities and Engineering from the Massachusetts Institute of Technology. He is a licensed Professional Engineer in Ohio (#33727) and Kentucky (#7374) and holds a General Radiotelephone license (PG-19-19343). He is a full member of the Association of Federal Communications Consulting Engineers.

This was prepared by him personally or under his supervision and is true and accurate to the best of his belief and knowledge.



Original stamped in purple.


Louis A. Williams, Jr., P.E.
Date: August 29, 1996

FM Spacing study

Title: PROPOSED MOUNT VERNON, KENTUCKY
Channel 270A (101.9 MHz)
Database: DW 08/21/96

Latitude: 37-22-29
Longitude: 84-26-41
Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
NEW COLUMBIA	APP	LINDSEY WILSON COLLEGE	*216A	3	37-06-09	248.4	81.46	10
		KY BPED-831130AJ	91.1	45	85-17-50	67.9	71.46	CLEAR
APP FOR REVIEW								
WUKY LEXINGTON	LIC	UNIVERSITY OF KENTUCKY	*217C	95DA	37-47-18	335.8	50.40	29
		KY BLED-891211KA	91.3	306	84-40-49	155.6	21.40	CLEAR
Was WBKY 10/01/89; DA: oddball ODD900212IH @ 0 deg								
WTHQ SHELBYVILLE	LIC	SHELBY COUNTY BCG., INC.	267A	3	38-12-48	325.8	112.9	31
		KY BLH-891124KA	101.3	100	85-10-16	145.4	81.95	CLEAR
Deletion proposed; ORDERED TO 269A; Was WCKP 08/31/92 per FCC release #190 dated 09/04/92; Ant: Jampro JLLP-4								
WLRO RICHMOND	LIC	WCBR RADIO, INC.	268C3	7.20	37-52-45	10.5	56.96	42
		KY BLH-951101KC	101.5	165	84-19-33	190.6	14.96	CLOSE
Was WMCQ-FM 12/08/95 per FCC release #269 dated 12/08/95; Ant: Harris FMXL-4E								
WKYM MONTICELLO	LIC	REGIONAL BROADCASTING CO	269A	1.75	36-48-36	209.7	72.16	72
		KY BLH-930721KB	101.7	188	84-50-49	29.5	.155	CLOSE
ANTENNA MAKE: BROADCAST ELECTRONICS; Ant: BEMP-4E								
W270AA HARLAN	LIC	VALLEY BROADCASTING, INC	270FT	.11	36-50-50	120.1	115.9	115
		KY BLFT-950105TD	101.9	-186	83-19-10	300.8	.889	CLOSE
Translator for WAXM, BIG STONE GAP, VA								
WKRQ CINCINNATI	LIC	CITICASTERS COMPANY	270B	16.2	39-06-58	358.6	193.4	178
		OH BLH-880307KC	101.9	267	84-30-05	178.5	15.36	CLOSE
WQXQ CENTRAL CITY	LIC	MUHLENBERG BROADCASTING	270C1	100	37-35-03	276.7	226.5	200
		KY BLH-930826KA	101.9	204	86-59-29	95.1	26.45	CLEAR
Was WKYA 02/26/93 per FCC release #199 dated 02/26/93; Ant: Harris FMH-8AC								
WLJC BEATTYVILLE	ORD	HOUR OF HARVEST INCORPOR	271A		37-36-23	68.7	71.71	72
		KY BPH-901212IC	102.1		83-41-16	249.1	-.29	SHORT
DOC-90-199; Amended 05/08/91; ORDERED FROM 272A; TDF								
WKYL LAWRENCEBURG	LIC	FWJR COMMUNICATIONS, INC	271A	3	38-02-16	330.1	85.11	72
		KY BLH-930521KF	102.1	100	84-55-46	149.8	13.11	CLOSE
Hearing DOC-90-271, adopted 05/02/90, released 06/11/90; Call Granted 09/25/92 per FCC release #192 dated 10/09/92								
WLLK SOMERSET	LIC	KERRY RICH & JOEL KENNAM	272A	3	37-04-41	212.1	38.87	31
		KY BLH-890831KD	102.3	100	84-40-39	31.9	7.866	CLOSE
Call Granted 06/13/88								
WLTO NICHOLASVILLE	LIC	CLARK BROADCASTING CO.	273A	2	37-49-52	354.0	50.93	31
		KY BLH-880909KA	102.5	122	84-30-18	174.0	19.93	CLEAR
Was WLRO 11/03/95 per FCC release #267 dated 11/21/95								

>> End of channel 270A study <<

FIGURE 1
70 dBu CONTOUR FOR
PROPOSED NEW FM IN
MOUNT VERNON, KENTUCKY
Louis A. Williams, Jr. and Associates
August 1996

